

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

**FILED**  
**OCT 28 2024**  
U.S. BANKRUPTCY COURT  
BY ASX DEPUTY

In Re:

Texas REIT, LLC  
Debtor.

§  
§  
§  
§  
§

Case No. 24-10120-smr

Chapter 11

**CREDITOR'S OBJECTION TO**  
**CLAIM OF JOHN QUINLAN, OMAR KHAWAJA AND OSAMA ABDULATIF**  
**(Claim No. 9-1)**

This is an objection to your claim in this bankruptcy case. This objection asks the Court to disallow (eliminate), reduce, or modify your claim as set forth in this objection. If you do not file a written response to this objection within 30 days from the date of mailing of this objection, the Court may disallow (eliminate), reduce, or modify your claim as set forth in this objection, without a hearing being held.

Any response to this objection must explain your position and be timely filed with the United States Bankruptcy Clerk, Western District of Texas, mailing address of applicable Clerk's office. If a timely response is filed, the Court will then set a hearing on the objection and you will be provided with notice of the date, time, and place of the hearing. If you do not attend the hearing, the Court may decide that you do not oppose the objection to your claim.

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW Ali Choudhri and files this Objection to Claim of John Quinlan, Omar Khawaja and Osama Abdulatif and would show as follows:

1. John Quinlan, Omar Khawaja and Osama Abdulatif have filed what they claim to be a secured claim in the amount of \$4,847,894.68.
2. The claim is based upon three judgments, NONE of which were against the Debtor as follows:
  - a. Jetall Companies, Inc. v. Richard Heil, Todd Oakum and Renee Davy—attorneys' fees awarded in favor of Defendants

- b. Jetall Companies, Inc. v. Hoover Slovacek, LLP—attorneys’ fees and sanctions awarded in favor of Defendant
- c. Osama Abdulatif and Abdulatif & Company, LLC v. Ali Choudhri and Houston Real Estate Properties, LLC—judgment in favor of Plaintiff against Defendants (THIS IS SUPERSEDED by a multi million dollar cash BOND) see envelope no. 73037012 filed 2.23.2023 (attached)

3. The Claimants have a long history of interference and bad faith against the Debtor and its principal and its creditors. The Claimants have interfered with the Debtor and the Creditor here and frustrated the efforts of the Debtors’ business and impacted the Creditor and other creditors.

4. The Creditor hereby brings a claim for slander of title and tortious interference against Claimants.

5. The Claimants in this case filed an Adversary Proceeding in the Bankruptcy Court for the Southern District of Texas in which they alleged that Magnolia BridgeCo, LLC, Jetall Companies, Inc., Arabella PH 3201, LLC, 9201 Memorial Dr., LLC, 2727 Kirby 26L, LLC, Texas REIT, LLC, Dalio Holdings I, LLC, Dalio Holdings II, LC, Houston Real Estate Properties, LLC, Shahnaz Choudhri (the MOTHER of Ali Choudhri), Ali Choudhri, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC and Galleria Loop Note Holder, LLC were alter egos of each other. In such adversary proceeding, Messrs. Quinlan and Khawaja claim to be the assignees of the judgments in favor of Richard Heil, et al and Hoover Slovacek, LLP.

6. Hoover Slovecsek was counsel for Jetall Companies, INC and breached the conflict waiver (See attached Exhibit 3,4,5) See conflict waiver, email acknowledge Hoover Slovacek would not represent Renee Davy oakum, then the Petition where Hoover Slovacek violated that agreement and represented Rene Davy Oakum.

7. The Claimants have violated the automatic stay. The Claimants have slandered title of Texas REIT, LLC frustrating the rights of the Creditors and wrongfully filed lis pendens without any encumbrance claims or real property claims that are required for filing of lis pendens. Claimants have motivation to frustrate the bankruptcy process.

1. . . . Q. And are you familiar with this notice of

2. lis pendens?

3. . . . A. I believe I looked at it before it was filed,

4. yes.

5. . . . Q. And it looks like it's filed by

6. Mr. Abdullatif, and he is one of the parties to the

7. proof of claim; correct?

8. . . . A. Yes.

9. . . . MR. BALLASES: Objection. Form.

10. . . . Q. (BY MR. SATHER) And did you approve of the

11. filing of this notice?

12. . . . A. I must have if it was filed.

13. . . . Q. And what's your understanding of the purpose

14. of this notice?

15. . . . A. To make sure that we secure any proceeds that

16. could potentially come to Ali Choudhri or his entities

17. that he owes to us.

18. . . . Q. And do you know why it was filed?

19. . . . A. For that reason.

8. The Claimants should be sanctioned for bad faith and the filing of the false proof of claim.

The Claimants wrongfully claim and attempt to collect a judgment that is superseded with a multi million dollar cash bond see Ex 1. Claimants also wrongfully allege that Texas REIT is responsible for all of Ali Choudhri's liabilities. This would require Ali Choudhri and all the defendants to look to Texas REIT, LLC. The Claimant wrongfully claim Ali Choudhri is still married to Hira Azhar (sponsored frivolous litigation by the Claimant wrongfully claiming ownership in the Debtors estate). Claimants caused to be filed a faux divorce action whereas Hira Azhar ex-wife/putative wife at the direction of Claimants filed an action where Texas REIT, LLC was a party and a frivolous lis pendens was filed and later expunged and contempt order issued (Ex 2 and 2 A, 2 B, and 2 C, 2D) Claimants for over 12 years have engaged in barratry and asymmetric warfare against Debtor and its principal. The actions of Claimants should not be rewarded. The motivations need to be brought to light and veracity of the proof of claim filed by Claimants. (See highlighted DEPO 9.11.24) Exhibit 6 and 6 A

16 · · · · Q · (BY MR. SATHER) · Are you alleging that Texas

17 · REIT is the alter ego of Dalio I Holdings (sic), LLC?

18 · · · · · MR. BALLASES: · Objection. · Form.

19 · · · · A · Yes.

20 · · · · Q · (BY MR. SATHER) · And would your answers be the

21 · same if I went through all of the rest of the names of

22 · the defendants in this case?

23 · · · · A · Yes, because Ali Choudhri controls all of

24 · them.

25 · · · · Q · All right. · And so are you alleging that Ali · Choudhri and Shahnaz Choudhri are alter egos of each

·2· ·other?

·3· · · · A· Yes.

9. The adversary proceeding which is used to attempt to establish that Texas REIT, LLC is liable for the debts of Ali Choudhri and Jetall Companies, Inc. contains only a single factual allegation with regard to Texas REIT, LLC, namely that Texas REIT, LLC was listed as an affiliate of Jetall Companies, Inc. in a Texas franchise tax form. All of the other allegations consist of unsupported generalities.

10. Claimants have filed fraudulent liens against 1001 West Loop, LLC another debtor and Claimants assert its an alter ego of Texas REIT, LLC

·7· · · · Q· Do you contend 1001, the property, 1001, or

·8· ·the entity that owns 1001, is an alter ego of Ali

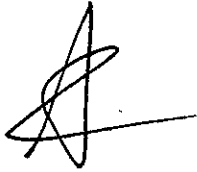
·9· ·Choudhri or Texas REIT?

10· · · · A· Yes· Yes, it is.

11. Furthermore, Claimants fail to provide an accurate payoff of the judgments they are allegedly owed. Creditor has attempted to pay the amounts, however Claimants have a moving target of the amount owed and not by a 5 or 10 % margin rather by several hundred percent. The Claimants desire is not be paid rather harass the Debtor and its principal and his mother.

Creditor prays that sanctions are awarded, and Claimant has to answer and explain the veracity of the Proof of Claim it filed under penalty of perjury.

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized 'A' followed by a horizontal line extending to the right.

Ali Choudhri, Pro Se

2425 West Loop Suite 1100      Houston Texas 77027

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served on 10/28/24 on interested parties by electronic delivery.

Label Matrix for local noticing Texas REIT, LLC U.S. BANKRUPTCY COURT  
0542-1 2450 Wickersham Lane, Suite 202 903 SAN JACINTO, SUITE 322  
Case 24-10120-smr Austin, TX 78741-4744 AUSTIN, TX 78701-2450  
Western District of Texas  
Austin

Mon Sep 30 17:09:36 CDT 2024

AGAPE Affordable Dumpster Rentals Akin Gump Strauss Hauer & Feld LLP  
6161 Savoy Drive Suite 500 6520 US Hwy 301 S Suite 112 1111 Louisiana Street, 44th Floor  
Houston, TX 77036-3326 Riverview, FL 33578-4324 Houston, TX 77002-5225

Ali Choudhri Amina Properties, L.L.C. Caz Creek Holdings 2, LLC  
2425 West Loop St 11 FL c/o T. Josh Judd c/o Howard Marc Spector  
Houston TX 77027 Andrews Myers, P.C. 12770 Coit Rd, St 850  
1885 Saint James Place, 15th Floor Dallas, TX 75251  
Houston, Texas 77056-4175

Caz Creek Holdings 2, LLC as Custodian for Caz Creek Lending City of Houston  
CCH TX2, LLC 118 Vintage Park Blvd No. W c/o Tara L. Grundemeier  
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Clark Hill PC Competition Roofing, Inc. Cypress BridgeCo, LLC and Magnolia BridgeCo  
500 Woodward Ave Suite 3500 7310 Fairview Street c/o McDowell Hetherington LLP  
Detroit, MI 48226-3485 Houston, TX 77041-2106 ATTN: Robert P. Debelak III  
1001 Fannin St., Ste. 2400  
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John Quinlan John Quinlan, Omar Khawaja, and Osama Abdull Mack Brooks, LLC as agent and  
c/o Steven A. Leyh c/o Steve Leyh Hoover Slovacek LLP attorney in fact for FGMS Holdings, LLC  
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Steadfast 829 Holdings, Inc. US Insurance Funding United States Trustee - AU12  
c/o Rodney Drinnon 8303 SW Freeway Suite 435 United States Trustee  
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2000 West Loop South Suite 1850 Austin, TX 78701-2450  
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WCW HOUSTON PROPERTIES, LLC WCW Houston Properties, LLC WCW Houston Properties, LLC  
Attn: Judith Chang - CFO Attn: Tami Kim Broker Associate/Attorne Howley Law PLLC c/o Eric Terry  
3657 Briarpark Drive, Ste. 188 6100 Corporate Drive, Suite 319 711 Louisiana Street, Ste 1850  
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WCW Houston Properties, LLC WCW Houston Properties, LLC Wrinkle, Gardner & Company, PC  
c/o M. Kevin Powers c/o Matthew Kevin Powers PO Box 1707  
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Austin, TX 78701-4042

The preferred mailing address (p) above has been substituted for the following entity/entities as so  
specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002  
(g)(4).

Harris County Tax Assessor (d)Harris County, et al (d)Harris County, et al.  
Po Box 4622 P.O. Box 2848 P.O. Box 2848  
Houston, TX 77210-4622 Houston, TX 77252 Houston, TX 77252



The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)FGMS Holdings, LLC End of Label Matrix  
12000 Network Blvd., Bldg. B Suite 210 Mailable recipients 47  
San Antonio, TX 78249-3353 Bypassed recipients 1  
Total 48